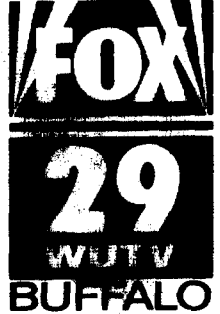


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951 WHITEHAVEN ROAD  
GRAND ISLAND, NEW YORK  
14072-1998

716/773-7531 TEL  
716/773-5753 FAX



RECEIVED

SEP 21 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

September 14, 1994

Office of Commissioner Andrew Barrett  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Commissioner Barrett:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station WUTV, I strongly urge you not to retain the "off-network" portion of the rule.

The relaxation of the off-network rule is very important to my station and is necessary to provide continued ability to program product already purchased. As a station that may be changing from a Fox Network station to that of another network, it is essential we be allowed to honor contracts, in their entirety, that were entered into months ago. WUTV holds contracts for "Home Improvement", "Seinfeld", "Prince of Bel Air", "The Simpsons", and "Blossom". This product represents an investment of many millions of dollars and restricting our use of them between 7:00-8:00pm would mean a considerable net loss to our station.

Additionally, because of the many changes taking place in our industry, vis-a-vis station affiliation changes, the repeal of the "off-network" portion of the Prime Time Access Rule would allow stations to make the investments necessary to keep their stations competitive without suffering undue financial loss if their stations become earmarked for affiliation change.

I strongly feel that if the FCC examines this issue, it should proceed directly to rule making.

PTAR was a ruling that was necessary at a different time in broadcast history. With the addition of the Fox Network, and the potential for at least one other network to take shape within the next year, it is a ruling that is no longer needed.

Sincerely,

Willard J. Stone  
Vice President/General Manager

WJS/df

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AN ACT III BROADCASTING STATION



**WOAC • TV**

4867 FULTON DR, CANTON, OH 44718-2398  
(216) 492-5267 • FAX (216) 492-8487

94-123  
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SEP 21 3 22 PM '94

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**FCC MAIL ROOM**

September 13, 1994

OFFICE OF CHAIRMAN REED HUNDT  
FEDERAL COMMUNICATIONS COMMISSION  
1919 M STREET, NW  
WASHINGTON, D.C. 20554

Dear Chairman,

It is my understanding that the FCC may initiate a proceeding at its October meeting which would relax the Prime Time Access Rule. On behalf of my station, WOAC TV67 in Canton, OH, I am urging you to retain the "off-network" portion of the rule.

This rule is absolutely vital to our station and is a necessary vehicle in order to promote competition, diversity, and to suppress off-network program monopolies. Without the off-network rule, independent stations will have a difficult time securing the rights to top quality Off-Network programming. I strongly believe that the Networks ability to syndicate its own off-network productions is detrimental to the independent stations ability to acquire such programming. Obviously, the networks will first look to their affils for a clearance. With the big three networks poised to enter the off-network and first run market, special attention is desperately needed to insure fairness in the syndication marketplace.

Proposals to eliminate the off-network provision of PTAR will force us to regress to a system where the three major networks can squeeze out independent producers and stifle fair competition from stations not affiliated with The Big Three. I strongly urge you to do your part to instill fairness in syndication, and confidence in Independent television that they are negotiating on a level playing field.

Sincerely,

Kevin Hoffman  
Program Director

KJH/kh

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2065 Cantu Court • Sarasota, FL 34232

Danford L. Sawyer  
Chairman & President

September 12, 1994

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SEP 21 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Dear Commissioner Barrett:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station TV 62, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

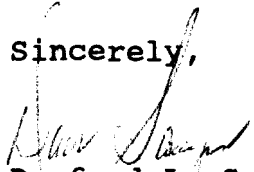
It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

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Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,

  
Danford L. Sawyer Jr.  
President & General Partner  
DeSoto Channel 62 Associates, Ltd.

DLS/rld

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94-133

SEP 21 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

September 16, 1994

WLVI-TV 56

75 Morrissey Boulevard  
Boston, Massachusetts  
02125

617-265-5656  
fax 617-265-2538

DOCKET FILE COPY ORIGINAL

Office of Commissioner Andrew Barrett  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

Peter Temple  
VP & General Manager

Dear Commissioner Barrett:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of WLVI-TV, I strongly urge you to retain the "off network" portion of the rule.

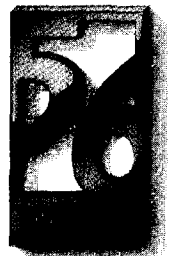
The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

There are three strong UHF independent stations in Boston bidding for top quality off-network programming. Without the off-network rule we will have a difficult time securing rights if the VHF network affiliates can air this producer during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming. WLVI-TV lost money during the last three years and is now marginally profitable. Relaxation of the rule will ultimately have a detrimental impact on our bottom line.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks posed to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

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A TRIBUNE BROADCASTING STATION



**Page 2**

**September 16, 1994**

**If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time, the FCC should not proceed directly to rule making. There are too many unresolved and complex which have not been discussed on the record. If you do, syndicators will immediately change the way they market their shows in anticipation of a rule change, and my station will have a harder time getting the product it needs as a result. I've already seen them try this in our market with shows like "Golden Girls", "Seinfeld", etc.**

**Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.**

**If you would like to discuss any of these issues further, please feel free to call me.**

**Sincerely,**

A handwritten signature in black ink, appearing to read "Peter Temple". The signature is stylized with a large, looped "P" and a cursive "Temple".

**Peter Temple  
Vice President & General Manager  
WLVI-TV, Boston**

**PT/mz**





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94-123

BUCK OWENS PRODUCTION COMPANY, INC.

September 12, 1994

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

KUZZ FM 107.9  
Fax 805.328.7535

KUZZ TV 45  
Fax 805.328.7576

KC&W AM 55  
Fax 805.328.7535

KTIE FM 107.1  
Fax 805.328.7535

HOME PREVIEW  
MAGAZINE  
Fax 805.328.7503

TARGET  
PRINT & MAIL  
Tel 805.325.3391

CAMERA ADS  
CLASSIFIEDS  
Tel 805.327.9803

KNIX FM 102.5  
Phoenix, AZ

KC&W AM 1580  
Phoenix, AZ

Lisa Smith  
Federal Communications Commission  
Office Of Commissioner Andrew Barrett  
1919 M Street, NW  
Room 826  
Washington, DC 20554

Dear Ms. Smith:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station KUZZ, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

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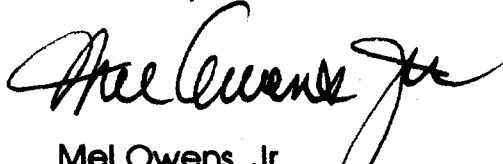
*[Handwritten signature]*

BUCK OWENS PRODUCTION COMPANY, INC.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,



Mel Owens, Jr.  
Secretary/Treasurer

MO/cm





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94-123

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September 15, 1994

KWGN-TV DENVER

SEP 21 1994

The Honorable Andrew Barrett  
Commissioner  
Federal Communication Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY  
John Suder  
Vice President  
and General Manager

6160 So. Wabash Way  
P.O. Box 5222  
Englewood  
Colorado 80155  
303.740.2850  
FAX 303.796.3740

Dear Commissioner Barrett:

I would like to bring to your attention an issue of utmost importance. This fall the Federal Communications Commission may initiate a proceeding to relax the *Prime Time Access Rule*. May I urge you to retain the "off-network" portion of this rule in the public interest.

Since this portion of PTAR has been instrumental in creating a strong independent television industry, the rule is vitally important to KWGN, and necessary to promote diversity and competition in our market. It is also an essential element in the Commission's goal of creating new off-air television networks.

Without the off-network rule, KWGN will have a difficult time securing the rights to quality off-network programming to air during the access period. More importantly, this will have a negative impact on our ability to finance programming for other dayparts, including news, public affairs and children's programming.

Major changes are taking place in the broadcast industry. With the big three networks poised to enter the off-network and first run syndication market, KWGN will have difficulty negotiating the rights to programming. Eliminating the off-network rule may make it impossible. As a result, the American public will then receive all information and entertainment programming from a few telecommunications sources.

May I recommend that if the Commission plans to examine this issue, to do so in the context of a neutral Notice of Inquiry. By so doing, the FCC would allow the many unresolved and complex issues to be discussed on the record.

Elimination of the off-network provision of PTAR would return us to a system where the three major networks can eliminate independent producers and stifle competition from non-network affiliated stations. The commission has the responsibility of promoting competition, which is what we seek. I urge you to retain the off-network rule.

Sincerely,

John Suder  
Vice President & General Manager

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September 13, 1994

Paramount Stations Group

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SEP 21 1994

The Honorable Andrew Barrett  
FEDERAL COMMUNICATIONS COMMISSION  
1919 M Street, N. W.  
Room 826  
Washington, D. C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Dear Commissioner Barrett:

It is my understanding that the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of KTXH-TV Paramount 20, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to KTXH and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This, in turn, will have a negative impact on KTXH's ability to finance programming for other dayparts, including public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, KTXH will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such KTXH deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,

*Michael D. Dunlop*

Michael D. Dunlop  
Vice President & General Manager

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MD:mah

8950 Kirby Drive, Houston, TX. 77054 (713)661-2020 Fax: (713)665-3909

*A Paramount Communications Company*

94-123

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Hal Capron  
Vice President  
General Manager

September 13, 1994

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Commissioner Andrew Barrett  
Federal Communications Commission  
1919 M Street, NW  
Room 826  
Washington, DC 20554

Dear Commissioner Barrett:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of the station KOKI-TV, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega-mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

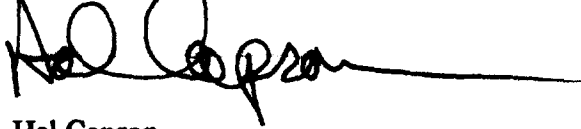
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Commissioner Barrett  
September 11, 1994  
Page 2

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hal Capron', with a long horizontal line extending to the right.

Hal Capron  
KOKI-TV

HC/lg



Independent  
Television

94-123  
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SEP 21 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

September 13, 1994

The Honorable Reed E. Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Mr. Chairman:

On behalf of local independent television stations, including Fox-affiliated stations and stations planning to form the fifth and sixth networks, I urge you to proceed cautiously with the Commission's re-examination of the Prime Time Access Rule. INTV recognizes that the FCC has an obligation to review its longstanding rules. We welcome a neutral examination of the Prime Time Access Rule. Nevertheless, based on trade press reports, we do not believe the Commission should proceed directly to a Notice of Proposed Rule Making, which tentatively concludes that the "off-network" portion of the rule should be revised or eliminated.

It is beyond dispute that the "off-network" rule has fostered competition and diversity in local broadcast markets. Independent stations, especially UHF stations, need this rule to gain access to the top quality "off-network" programs. A disproportionate share of my members' revenues emanate from the early fringe and access periods. These revenues are critical to the development of news operations, public affairs programs and the ability to purchase new, first run, prime time programming.

These problems will be exacerbated if the big three networks begin syndicating their own "off-network" programs. It will reach a critical stage if the rumored mergers between the big three networks and major studios take place. In this environment, eliminating the "off-network" rule will dramatically decrease competition from independent television stations. Moreover, independent production for the access period will be "squeezed out."

Make no mistake: eliminating the "off-network" rule is tantamount to a repeal of the entire Prime Time Access Rule. The "off-network" provision was enacted precisely because the rule would not work without it. From a legal and policy standpoint, you cannot eliminate the "off-network" portion of the rule without jeopardizing the justification for the entire Prime Time Access Rule itself.

A purported "surgical strike" on the "off-network" rule, while retaining the rest of the Prime Time Access Rule, is bad public policy. It would have the perverse effect of protecting big three network affiliates, which dominate local television markets, while at the same time hurting the competitive position of struggling independent and new emerging network stations.

For the 40% of the American television viewers who do not subscribe to cable, independent television stations offer the only non-network alternative. An administration that is devoted to helping new viewing entrants into the television business should not ignore the needs of independent stations. For the most part, new entrants into the business start out by owning smaller independent stations. The "off-network" rule is one key to their survival.

Mr. Chairman, you have initiated a debate regarding a new social compact between the television industry and the American people. Participants in this "new deal" should not be limited to the big three networks. They do not represent the entire television industry. The

1 copy

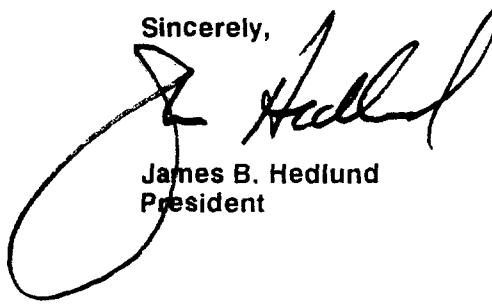
Honorable Reed E. Hundt  
September 13, 1994  
... 2

proposals to modify FCC rules that evolve out of a new compact must take the entire television industry into consideration. The Prime Time Access Rule, particularly the "off-network" rule, is too important to a significant segment of the television industry to be cast aside.

INTV looks forward to working with the Commission as it reviews the Prime Time Access Rule. We believe strongly, however, that the complexities of today's market cry out for a neutral examination. To date, the Commission simply does not have a sufficient record to reach any tentative conclusions regarding the continued viability of the "off-network" portion of the Prime Time Access Rule. It is premature to move directly to a Notice of Proposed Rule Making, without first having the benefit of a far ranging Notice of Inquiry.

We would be pleased to discuss our concerns with you and your staff at a time of your choosing.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Hedlund", is written over the typed name and title.

James B. Hedlund  
President

cc: Honorable James H. Quello  
Honorable Andrew C. Barrett  
Honorable Susan Ness  
Honorable Rachelle B. Chong  
Office of the Secretary

MMB File No. 920117A, 870622A, 900418A



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September 15, 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Commissioner Andrew Barrett  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Commissioner Barrett,

It has come to my attention that the Federal Communications Commission may initiate discussions or proceedings to relax or eliminate the Prime Time Access Rule (PTAR). Why? It's working. The off-network portion has accomplished exactly what it intended to do when it was enacted.

If any revision of this rule is considered, expanding the off-network portion to the top 100 markets would better serve the public interest.

The original goal of the Prime Time Access Rule - to increase the amount of independent producers and not allow the three major networks to squeeze out this competition - has brought the American public a choice of original programming they would not have been able to enjoy. It has also given independent television stations the opportunity to compete and survive in their markets because they have been able to secure competitive programming and give the American public more choice.

I doubt sincerely if our station would have been able to survive its first three years of operation if the PTAR and the off-network portion had not been in effect.

I urge you to carefully weigh the effects that any relaxation of PTAR will have on Independent producers and stations.

Sincerely,

Tom Watson  
General Manager  
WTTA-TV

cc: Lisa Smith

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Jerry Carr  
General Manager

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SEP 21 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

September 15, 1994

Office of Chairman Andrew Barrett  
Federal Communications Commission  
1919 M. Street NW Room 826  
Washington, DC 20554

Dear Chairman Barrett:

As an independent station operator in Miami, Florida, I am extremely concerned that the FCC plans to examine the Prime Time Access Rule in the near future. I am hopeful that the "official network" aspects of the rule will be left in place.

In Miami, the Prime Time Access Rule has allowed two (2) independent stations to flourish alongside a full complement of ABC, NBC, CBS and FOX affiliates. These two (2) stations now may each, in turn, become an affiliate of the proposed Warner Brother's and Paramount networks, respectively. In essence, the Commission's desire to see new television networks emerge has been fulfilled, in part, by the off-net provisions of PTAR.

Our station's viability depends on our ability to acquire top-notch off-network programming for the prime access time period. As our most profitable daypart, any decline in our competitiveness in this area will crimp our ability to finance public affairs and children's educational program efforts. Furthermore, as studio groups and networks collaborate to enter first run syndication, many alternative sources of programming will be squeezed out. We'll be left with a few, behemoth distributors providing all programming for the American public.

I strongly urge the FCC to examine this issue closely before considering any rule making. The complex competitive issues surrounding PTAR and the off-network rule deserve intense scrutiny before any changes are effected.

Sincerely,

JERRY CARR

JC/ps  
b:work4/senate3

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8



Suite 300  
10 E. Cambridge  
Circle Drive  
Kansas City  
Kansas 66103

913.621.6262

facsimile  
913.621.4703

**KSMO-TV62**

94-123

September 12, 1994

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SEP 21 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Ms. Betty Freeman  
Confidential Assistant, Rm. 826  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Ms. Freeman:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station, KSMO-TV62, strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

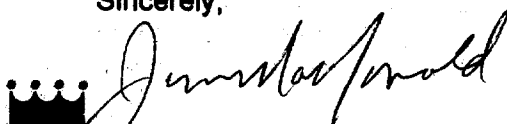
Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on KSMO-TV62's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time, the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as KSMO-TV62 deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,



Jim MacDonald  
V.P./General Manager



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